

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER P. IRVING

Plaintiff,

v.

Case No. 22 CV 6599

COOK COUNTY SHERIFF'S OFFICE, *et al.*

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO COMPLETE FACT DISCOVERY**

Plaintiff CHRISTOPHER IRVING, through his attorney, Heidi Karr Sleper of Kurtz, Sleper & Exline, LLC, moves for an extension of time to complete discovery pursuant to Fed. R. Civ. P. 6(b)(1)(A). Plaintiff has conferred with Defendants' counsel who does not oppose this motion. In support, Plaintiff states as follows:

1. The fact discovery deadline in this matter is currently set for September 15, 2023. (Dkt. 25).
2. The Parties have exchanged written discovery, the Plaintiff has produced documents, and the Plaintiff has been deposed.
3. The Parties still have Defendants' depositions to complete. The Parties are discussing dates in order to complete the depositions.
4. Despite working diligently on this matter, Plaintiff's counsel has been pulled away from completing the fact discovery in this matter due to the press of other litigation, including multiple summary judgment responses, two appeals, and other discovery deadlines.
5. The Parties have conferred and request until November 30, 2023 to complete the depositions due to Defendants' counsel having a trial beginning on October 30, 2023.

CONCLUSION

WHEREFORE, for the foregoing reasons, Plaintiff, Christopher Irving, respectfully requests the Court extend the close of fact discovery until November 30, 2023 in order to complete the depositions of the Parties, and for such other relief as is just and equitable.

Respectfully submitted,


Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served via ECF on September 15, 2023 to the below listed attorneys.

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/s/ Heidi Karr Sleper
